

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

**LUCA INTERNATIONAL GROUP L.L.C.
et al.,

Debtors.¹**

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§
§

Chapter 11

Case No. 15-34221-H2-11

Jointly Administered

**LIQUIDATING TRUSTEE'S MOTION TO ENFORCE SETTLEMENT AGREEMENT
AND REQUEST FOR ATTORNEYS' FEES**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JULY 17, 2017 AT 1:00 P.M. IN COURTROOM 400, 4TH FLOOR, 515 RUSK, HOUSTON, TEXAS 77002.

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSED THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

TO THE HONORABLE CHIEF UNITED STATES BANKRUPTCY JUDGE:

Liquidating Trustee Randy Williams ("Liquidating Trustee" or "Movant") files this Motion to Enforce Settlement Agreement and Request for Attorney's Fees ("Motion"), and would respectfully show the Court the following:

¹ The Debtors in these cases, along with the last four digits of their respective taxpayer ID numbers, are Luca International Group LLC (1086), Luca Operation, LLC (0343), Luca International Group (Texas) LLC (5577), Luca Barnett Shale Joint Venture, LLC (5340), Luca Energy Fund LLC (0677), Luca Energy Resources, LLC (3896), Luca Resources Group, LLC (1699), Luca I, LP (4104), Luca II, LP, (9778), Luca Oil, LLC (8161), Luca To-Kalon Energy LLC (3922), Luca Oil II Joint Venture (6604).

I. SUMMARY OF RELIEF REQUESTED

Debtors, Meiyu “Shelley” You (“Ms. You”), and the Official Committee of Equity Holders (the “Committee”) (collectively the “Parties”) entered into a binding settlement agreement that was approved by this Court on August 1, 2016 (Doc. No. 776), attached hereto as Exhibit “A”. Ms. You failed to pay funds due to the Liquidating Trust pursuant to the Settlement Agreement and is now attempting to circumvent the Settlement Agreement by entry of a subsequent agreement with Bingqing Yang that stopped a foreclosure on the Driscoll Road Property, and has received funds that belong to the Liquidating Trust. Liquidating Trustee seeks an order from this Court enforcing the Settlement Agreement.

II. JURISDICTION, VENUE, AND AUTHORITY

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This proceeding is a core proceeding pursuant to 28 U.S. § 157(b), and this Court has Constitutional authority to enter a final judgment in this proceeding. Venue is proper in this District and in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

III. RELEVANT BACKGROUND FACTS

2. On August 6, 2015, each individual Debtor filed for Chapter 11 bankruptcy. The Court entered an Order Granting Debtors’ Emergency Motion for Joint Administration of Cases under Case No. 15-34221-H2-11, in the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

3. On July 18, 2016, the Court entered its Confirmation Order, confirming the Debtors’ First Amended Joint Chapter 11 Plan, appointing Randy Williams as Liquidating Trustee, and approving the liquidating trust. (Doc. No. 766).

4. On or about July 28, 2016, Debtors, Ms. You, and Committee entered into a settlement agreement (the “Settlement Agreement”), whereby Ms. You agreed that the Liquidating Trustee shall be paid \$120,000 from the proceeds of any refinancing, sale or other liquidation or disposition of the real property located at 2822 Driscoll Road, Fremont, California 94539 (the “Driscoll Road Property”)..... See the Settlement Agreement, attached hereto as Exhibit “A”. Specifically, paragraphs e, f, and g of the Settlement Agreement states,

e. Ms. You agrees that the Liquidating Trustee shall be paid \$120,000 from the proceeds of any refinancing, sale, or other liquidation or disposition of the real property located at 2822 Driscoll Road, Fremont, California 94539 (the “Driscoll Road Property”) on account of the Debtors’ or Liquidating Trust’s subrogation rights to Polycomp Trust Company FBO Ira J. Boren (“Polycomp”) granted or acknowledged in the Order Granting Polycomp’s Claim of Interest in Proceeds at Doc. No. 545 and shall receive such \$120,000 prior to Ms. You obtaining any proceeds from the Driscoll Property;

f. Once the Liquidating Trustee has received payment of \$120,000 in full from the proceeds of the Driscoll Road Property, the Debtors agree that any further interest in or rights to the Driscoll Road Property that that Debtors of Liquidating Trustee may have, whether under a right of subrogation or otherwise shall be subordinate and junior to Ms. You’s claim and lien against the Driscoll Road Property, the Liquidating Trust shall be entitled to receive any remaining funds or property under the Debtors’ or is subrogation rights;

g. If the Debtors’ or Liquidating Trust subrogation rights to Polycomp are determined to be unenforceable or non-existent as to the Driscoll Road Property after the challenge of such subrogation rights by a third party to this Agreement, the Liquidating Trust shall be paid the first \$120,000 that Ms. You is entitled to receive from the proceeds of the Driscoll Road Property.

5. On July 28, 2016, Debtors filed their Expedited Motion to Approve Compromise of Controversy Under Bankruptcy Rule 9019 (Doc. No. 771).

6. On August 1, 2016, this Court issued the Order Granting Debtors’ Expedited Motion to Approve Compromise of Controversy Under Bankruptcy Rule 9019 (Doc. No. 776).

7. On or about February 15, 2017, counsel for Ms. You informed Liquidating Trustee of a pending foreclosure on the Driscoll Road Property that needed the Superior Court of California's approval to proceed with a certain bid placed by Ms. You.

8. In response, counsel for Liquidating Trustee sent the attached emails and letter, marked as Exhibit "B", advising that the Liquidating Trustee would seek court intervention if Ms. You does not pay the \$120,000 as agreed.

9. On or about April 13, 2017, counsel for Liquidating Trustee learned that the Ms. You's proposed bid was granted and that Ms. You would submit a credit bid and partial cash payment to the Alameda Sheriff's department for a Writ of Execution Sale. In an effort to determine the status of the matter, Counsel for Liquidating Trustee followed up numerous times with counsel for Ms. You.

10. On May 19, 2017, Allan Sarver, counsel for Polycomp sent a letter to the undersigned counsel advising that Polycomp's Deed of Trust was paid in full and to determine whether Debtors' Counsel objects to the reconveyance of the deed of trust to Ms. Yang. See Exhibit "C" attached hereto. Liquidating Trustee is opposed to this request because the Liquidating Trust has not been paid pursuant to the Settlement Agreement. If Ms. Yang is reconveyed the deed of trust, then the Liquidating Trust's subrogation rights will be hindered.

11. Subsequently, John Chu, counsel for Bingqing Yang, advised that Bingqing Yang refinanced the loan on the Driscoll Road Property and paid off Polycomp and Meiyu You, which then halted the Writ of Execution Sale. See Exhibit "D" attached hereto.

IV. CONCLUSION AND RELIEF REQUESTED

12. Therefore, Ms. Yang refinanced the loan on the Driscoll Road Property and paid off Polycomp and Ms. You, who did not pay the Liquidating Trust pursuant to the Settlement Agreement. Ms. You has breached the Settlement Agreement, and Liquidating Trustee seeks to enforce the it.

13. Liquidating Trustee has incurred attorneys' fees in bringing this motion and hereby seeks reasonable attorneys' fees.

V. Prayer

WHEREFORE, Liquidating Trustee, Randy Williams, respectfully requests that this Court grant its Motion to Enforce the Settlement Agreement and Request for Attorneys' Fees, that the Court entered an order directing Ms. You to disburse funds, which are still due and owing, to the Liquidating Trust, and that it grant such other and further relief, either at law or equity, general or special, to which the Liquidating Trustee may show himself justly entitled.

DATED: June 15, 2017

Respectfully submitted,

HOOVER SLOVACEK LLP

By: /s/ Brendetta A. Scott

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ATTORNEYS FOR LIQUIDATING TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2017, a true and correct copy of the foregoing Motion to Enforce was served via the Court's ECF Notification System to the parties listed below.

/s/ Brendetta A. Scott
BRENETTA A. SCOTT

15-34221 Notice will be electronically mailed to:

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